

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

Cr. No. 05-10164 GAO

GUILLERMO VASCO

DEFENDANT GUILLERMO VASCO'S REQUEST FOR VOIR DIRE
OF THE PROSPECTIVE JURORS

Now comes the defendant in the above-captioned matter, Guillermo Vasco, and moves this Honorable Court, pursuant to Fed. R. Crim. P. 24(a), to examine the prospective jurors by inquiry as follows:

I. Victim of Crime

1. Have you ever been a victim of a crime?

If yes, please describe the incident:

- a. When did it take place?
- b. What was the age, race, national origin, and sex of the perpetrator?
- c. Were the police called?
- d. Was anyone arrested?
- e. Did you testify in court?
- f. What impressions about the police, prosecutors and about the judicial system did you form as a result of your experience?
- g. Will this experience interfere in any way with your ability to be fair

and impartial in this case?

II. Relationship to Law Enforcement Personnel

1. Are you related to, or close friends with, any federal agents, police officers, district attorneys, or other law enforcement personnel? If yes:
 - a. Please describe your relationship with this person?
 - b. How often do you see him / her?
 - c. Where does he / she work?
 - d. Does he / she discuss his / her work with you?
 - e. As a result of your contact with this person, what are your impressions about police work / district attorneys' office, etc.?
 - f. Will this relationship interfere in any way with your ability to be fair and impartial in this case?

III. Attitudes and Impressions About Law Enforcement and Criminal Justice System

1. What does it mean to you when the police arrest or the government indicts someone?
2. Do you think the police could mistakenly or knowingly arrest the wrong person, or the government could mistakenly or knowingly indict the wrong person? Why or why not?
3. Does the fact that the defendant has been arrested or indicted make you think they did something wrong?

4. Do you believe that a federal agent's testimony should be given more weight than the testimony of any other witness?
5. Do you believe that a federal agent's testimony should be considered more truthful than the testimony of other witnesses?

IV. Attitudes About Victim / Nature of Crime / Defendant

1. Will the fact that this case involves charges of murder for hire affect your ability to be a fair and impartial juror?
2. Will the fact that this case involves facts relating to domestic violence affect your ability to be a fair and impartial juror?
3. Are you related to, or close friends with any person who has been the victim of a crime of murder or domestic violence? If so, would that affect your ability to be a fair and impartial juror?
4. Do any of you believe that Central American or Equadorian persons, simply because they are Central American or Equadorian, are more likely to commit crimes or more likely to be involved in murder for hire offenses than persons who are not of that descent?
5. Do any of you believe that Central American or Equadorian persons, simply because they are Central American or Equadorian, are more likely to commit crimes or more likely to be involved in domestic violence offenses than persons who are not Central American or Equadorian ?
6. Do any of you have feelings one way or another about persons of Central

American or Equadorian ancestry that would make it at all difficult for you to act as a fair and impartial juror in this case?

VI. Presumption of Innocence

1. Does the fact that Guillermo Vasco is charged with a serious crime make you think he must have done something wrong?
2. Do you believe that Guillermo Vasco could be innocent even though he is charged with a serious crime?

Respectfully submitted,
Guillermo Vasco
By his attorney,

Dated: October 27, 2006

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document filed this date through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent this date to those indicated as non-registered participants.

/s/ Melvin Norris
MELVIN NORRIS